

Mark A. Hutchison (4639)
Jacob A. Reynolds (10199)
Hutchison & Steffen, LLC
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
Telephone: 702.385.2500
Facsimile: 702.385.2086
mhutchison@hutchlegal.com

Michael Dockterman *pro hac vice*
Olivia G. St. Clair *pro hac vice*
Steptoe & Johnson LLP
115 S. LaSalle Street, Suite 3100
Chicago, IL 60603
Telephone: 312.577.1300
Facsimile: 312.577.1370
mdockterman@steptoe.com

Attorneys for Defendants
Toyota Motor Sales, U.S.A., Inc., Saatchi & Saatchi
North America, Inc., and Smuggler, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ERIC E. DAHL, an individual,

Plaintiff,

vs.

TOYOTA MOTOR SALES, U.S.A., INC.,
A California corporation, SAATCHI &
SAATCHI NORTH AMERICA, INC.,
a Delaware corporation; SMUGGLER, INC.,
a California corporation, DOES 1 through
X; and ROE CORPORATIONS 1 through
X, inclusive,

Defendants.

Case No.: 2:14-cv-01737-JCM-PAL

**STIPULATION FOR DISMISSAL WITH
PREJUDICE PURSUANT TO FRCP 41**

1 Plaintiff Eric E. Dahl, by and through his counsel Jeffrey Galliher, and Defendants
2 Toyota Motor Sales, U.S.A. Inc., Saatchi & Saatchi North America, Inc., and Smuggler, Inc.
3 (collectively, "Defendants"), by and through their counsel Hutchison & Steffen and Steptoe &
4 Johnson, hereby stipulate pursuant to FRCP 41 to voluntarily dismiss this action and all claims
5 **with prejudice**, with each of the parties to bear their own attorney fees and costs. Such
6 stipulation to act as a dismissal with prejudice as if the claims had been fully adjudicated on the
7 merits.

8 Dated: May 27, 2015

9 Respectfully submitted,

10 **Law Offices of Steven M. Burris**

Hutchison & Steffen, LLC

11 /s/ Jeffrey L. Galliher
12 Jeffrey L. Galliher, Esq.
13 2810 W. Charleston Blvd., Suite F-58
14 Las Vegas, Nevada 89102

/s/ Jacob A. Reynolds
Mark A. Hutchison (4639)
Jacob A. Reynolds (10199)
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145

15 *Counsel for Plaintiff*

and

Michael Dockterman pro hac vice
Olivia G. St. Clair pro hac vice
Steptoe & Johnson LLP
115 S. LaSalle Street, Suite 3100
Chicago, IL 60603

Counsel for Defendants

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5 and LR 5-1, I hereby certify that on May 27, 2015, I caused a copy of the **STIPULATION FOR DISMISSAL WITH PREJUDICE PURSUANT TO FRCP 41**, to be served via CM/ECF and U.S. Mail upon the following counsel:

Jeffrey L. Galliher, Esq.
Law Offices of Steven M. Burris
2810 W. Charleston Blvd., Suite F-58
Las Vegas, Nevada 89102

/s/ Maddy Carnate-Peralta
An employee of Hutchison & Steffen